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NHTSA-00-8011-47

SUBARU

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June 5, 2002
Ref. No.: GA02-036

Jeffrey Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

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RECEIVED

Re: Docket No. NHTSA-00-8011, Federal Motor Vehicle Safety Standard Notice of Proposed Rulemaking: Tires

Dear Dr. Runge,

Subaru of America, Inc. ("Subaru"), the distributor for Subaru vehicles in the United States, on behalf of Fuji Heavy Industries, Ltd., the manufacturer of Subaru vehicles, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) to establish new and more stringent tire performance requirements. Subaru is pleased to have this opportunity to provide its comments to NHTSA on this Proposal [Federal Register/Vol. 67, No. 43/March 5, 2002, pages 10050-10085 and Federal Register/Vol 67, No. 82/April 29, 2002, page 20943].

In particular, Subaru wishes to comment on the proposed changes to FMVSS 110 in S4.2.2.3(a). Currently, in compliance with FMVSS 110, S4.2.2 Subaru has vehicle normal loads of 56-81% of the tire maximum load rating. But more importantly, Subaru has no reports of tire problems related to tire loads. Subaru testing and product follow up analysis shows that these tire applications function reliably and are more than adequate for both the FMVSS and real world demands on their load-carrying capacity.

Subaru has calculated the proposed load limits on the seven (7) tire variants currently in use on Subaru sedan and wagon vehicles. For three (3) of these tires, calculations resulted in percentages 0.2-3.0% over the proposed limit on the front axle. For an additional three (3) tire applications, the result was within the compliance limit but by less than 5%.


Since tires on both the front and rear axle need to be the same, adoption of the proposed S4.2.2 requirement could require completely new tires on almost all Subaru model variants. Such tires would have to have a higher profile and/or wider construction. This could have significant effects on wheel opening and suspension design, compliance with future emission and fuel economy standards, vehicle ride height and stability considerations, etc.

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In summary, Subaru finds that the proposed change to FMVSS 110 would have no safety benefit over current passenger car applications. Furthermore, such a change could have important negative cost and design results. Therefore, Subaru requests that the agency reconsider its Proposal and delete the change in FMVSS 110, S4.2.2.3(a).

We appreciate the opportunity to provide the above comments. If there are any questions, please contact myself at (856) 488-8644 or Gerald Plante at (856) 488-3226.

Sincerely,



Don Bearden

Director, Governmental Affairs

cc: Mr. Joseph Scott, Office of Crash Avoidance Standards, NHTSA
Docket Management, Room PL-401, NHTSA, 400 Seventh St. SW, Washington,
DC 20590 (2 copies enclosed plus electronic submission)